

From: Ignatius Grande <igrande@thinkbrg.com>

Sent: Friday, May 2, 2025 2:58 PM

Subject: re: IME WatchDog, Inc. v. Gelardi, et al. (1:22-cv-1032)

CAUTION - EXTERNAL:

Dear Judge Chen,

I am writing you to provide you an update as requested in the IME WatchDog, Inc. v. Gelardi, et al. matter (1:22-CV-01032). Shortly after the April 2nd court conference that I participated in, on 4/7, BRG did receive that initial payment of \$2,000 from the Defendants in this matter. However, I am writing to inform you that BRG did **NOT** receive a subsequent payment yesterday (May 1, 2025). I just checked again with our Finance Department and they confirmed that no payment came through yesterday, 5/1. As per your order following the show cause hearing, “[b]eginning on Thursday, May 1, 2025, Safa shall pay BRG \$500 on the first of every month, regardless of the day of the week, until her outstanding balance to BRG is satisfied. In the event that any of these payments is late, Safa will be sanctioned \$500 per late or missed payment.”

In addition, as I noted during the oral argument in April, as per our engagement letter, BRG is entitled to “a late payment charge of one percent (1%) per month.” According to our Finance Department’s calculations, as of April 3rd, the interest that the defendants have incurred as of that date was **\$10,520.73**. I have attached a chart showing those calculations. Please let me know if you have any question or need any additional information.

Best regards,

Ignatius

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